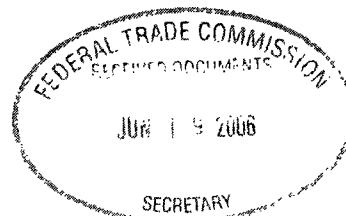


Ava de Pina
[REDACTED]
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522418-70085

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex W)
600 Pennsylvania Ave, NW
Washington DC 20580



Re: Business Opportunity Rule, R511993

To Whom it may concern:

I am writing this letter because I am very concerned about the proposed Business Opportunity Rule R511993. I am quite certain that in its current form, some of the provisions will directly curtail my ability to sell Mannatech products.

One of the most arbitrary and unfair proposals is the 7-day waiting period to enroll new distributors at the All Star level (\$1099). As you are well aware, people buy refrigerators, cars, houses etc that cost MUCH more than that without a 7-day waiting period. A mandatory waiting period would not only give people the impression that there is something wrong with our products and business, but it would also inhibit their ability to buy these supplements in a timely manner. **The Mannatech Company** already has a 90% buyback policy so this new ruling is completely redundant.

The proposed rules also call for the release of ANY information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if Mannatech was found innocent. In our litigious society where anybody can sue for any reason, this ruling does not make sense! And with the information highway provided by the Internet, any interested person can find out whatever they want about any company.

Finally this proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. This rule is just plain idiotic! How would a brand new distributor provide these references? And who would want to comply with such a rule? If the object is to deter direct marketing business, this would certainly do the job.

I have been a Mannatech distributor for years and have NEVER had complaints that pertain to the rules being proposed.

I appreciate the work of the FTC to protect consumers but at some point you have to let adults make decisions on their own. These proposed new rules are burdensome, unfair and will have many terrible unintended consequences. I'm sure that there are better ways to achieve your goals.

Thank you for your time.

Sincerely,
[REDACTED]

Ava De Pina

6/12/06